

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

IN RE AKAZOO S.A. SECURITIES
LITIGATION

Case No. 1:20-cv-01900-BMC

CLASS ACTION

**NOTICE OF MOTION AND UNOPPOSED MOTION FOR FINAL APPROVAL OF
PARTIAL CLASS ACTION SETTLEMENT AND PLAN OF ALLOCATION**

TO THE CLERK OF THE COURT AND ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that, pursuant to the Court Order Preliminarily Approving Partial Class Action Settlement and Providing for Notice (ECF No. 36), on September 7, 2021 at 10:00 a.m., before the Honorable Brian M. Cogan, in Courtroom 8D South of the United States Courthouse, Eastern District of New York, 225 Cadman Plaza East, Brooklyn, NY 11201, Court-appointed Lead Plaintiffs Tim Caldwell, Sharon Caldwell, Nikolaos Poulakis and John Pullen (collectively, “Federal Plaintiffs”), and plaintiffs Eva Pareja and Greg Sweet, plaintiffs in the State Action (collectively, the “State Plaintiffs” and together with Federal Plaintiffs, “Plaintiffs”)¹ will and hereby do move the Court to: (1) grant final approval of the partial Settlement in the Class Actions on the terms set forth in the Stipulation; and (2) approve the proposed Plan of Allocation for distribution of the Net Settlement Fund.

This motion is based on this Notice of Motion; the memorandum of law in support thereof; the Declaration of Phillip Kim and Casey E. Sadler in Support of: (I) Plaintiffs’ Motion for Final Approval of Partial Class Action Settlement and Plan of Allocation; and (II) Class Counsel’s Motion for an Award of Attorneys’ Fees and Reimbursement of Litigation Expenses; all exhibits thereto; all pleadings and papers filed herein; arguments of counsel; and any other matters properly before the Court. Defendants do not oppose this motion.

A proposed order will be submitted on reply.

¹ Capitalized terms that are not otherwise defined herein have the same meanings given to them in the Stipulation and Agreement of Partial Settlement, dated April 22, 2020 (the “Stipulation,” ECF No. 32).

Dated: August 3, 2021

Respectfully submitted,

THE ROSEN LAW FIRM, P.A.

/s/ Phillip Kim

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Class Counsel for the Settlement Class

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was electronically filed with the Clerk of Court via the CM/ECF system, which will send Notice of such filing to all counsel of record.

Dated: August 3, 2021

/s/ Phillip Kim

Phillip Kim